



Thermador Groupe's donations and patronage/sponsoring policy

1-Reminder of the general principle

1.1 Reminder of the Code of Conduct (paragraphs 2.3 'Donations to charitable or political organisations' and 2.4 'Sponsorship')

Donations and gifts are benefits given to a company, foundation or association in the form of money and/or contributions in kind; they are allocated for a specific purpose: research, training, environment (sustainable development), charitable or humanitarian ends, etc.

Political contributions - monetary or otherwise - are intended to support political parties, officials or initiatives.

Through patronage or sponsorship, the company seeks to provide financial or material support to a work, or a social, cultural or sporting action in order to communicate around and promote its values.

1.2 Clarifications

If **charitable donations** are made, the following precautions should be taken:

- donations should not be made if there is any doubt about the quality and reputation of the charity or its purpose.
- donations should only be made in situations where they cannot be interpreted as an attempt to gain undue influence or an improper business advantage.
- donations must not be made to individuals.
- donations/payments cannot be made in cash.
- charitable donations cannot be made in the context of a bidding process or commercial or financial negotiations involving persons related to the beneficiary.

Patronage is the donation of money or material by a company to an organisation operating in the general interest, without expecting any equivalent consideration in return, and is intended to enhance the institutional image of a company. Patronage donations can take different forms:

- a cash contribution,
- provision of staff and premises free of charge,
- donations of goods and/or products,

Sponsorship involves material support given to an event or organisation with a view to obtaining publicity benefits: the name, brand and message of the sponsoring company is widely publicised at the event.

Donations, sponsorship and patronage activities should not be made in order to obtain or procure an undue advantage or unduly influence a decision. Such requests should be considered carefully, particularly those from those in a position to influence the company's activities or who might, if the donation were granted, gain some personal advantage. They should be made without seeking any specific benefit from the recipient other than the promotion of the company's image.

Good practices to be implemented

- Ensure that donations and sponsorships are made in a transparent manner.
- Ensure that foundations, associations and organisations receiving donations or financial support implement practices consistent with our values and expectations regarding the prevention of corruption.
- Refuse all payments to private accounts or in cash.
- Ensure that all payments are properly recorded and accounted for, and that documentary proof is kept.
- Avoid the risk of a conflict of interests.

2-Specific framework

2.1 Donations

Requests for donations must be systematically discussed with the members of the Executive Committee of each subsidiary (amounts and number of beneficiaries) and be of a reasonable value (with a maximum threshold of approximately 0.2% of post-tax income). Donations must be traceable in the company's accounts (receipts must be kept). The donation must only have a charitable purpose and must not give rise to any compensation in exchange.

2.2 Political contributions

Political contributions are strictly forbidden by the group. Thermador Groupe employees' political commitments are a private matter.

2.3 Patronage and sponsorship actions

Patronage and sponsorship actions are the responsibility of the CEO or Managing Director of each subsidiary. These actions, as well as any promotion of the brand (via displays, flags, T-shirts, etc.) must not harm the reputation of the subsidiary or the group. All sponsorship and patronage operations must be covered by a contract, regardless of the amount, which precisely defines the context and purpose of the operation as well as the terms and conditions of payment of the aid.

Before initiating any sponsorship action, employees must carry out all the necessary checks to ensure that it is relevant and complies with the rules of Thermador Groupe (cf. paragraph 1). They must inform their direct report within a reasonable period of time whenever a request for sponsorship is made to them by a third party.

2.4 Communication

Donations, sponsorship and patronage must be reported annually:

- in a general meeting to the employees of the subsidiary concerned (amounts and orientations),
- to Executive Committee members (amounts and actions taken).
- in January, to Thermador Groupe as part of the non-financial statement.